From: Robert Frey

Sent: Tuesday, November 03, 2015 9:53 AM

To: Briel, Ron

Subject: 407 process for Surgical Technology

Mr. Briel,

Allow me to introduce myself. My name is Rob Frey and I am the Program Director for the newly formed Surgical Technology program at WNCC in Scottsbluff. I have been a Surgical Technologist for over 25 years and a Surgical First Assistant for nearly 20. I have also worked in healthcare and technical education for 8 years, and was involved in the initial development of the program here at WNCC.

I want to thank you for your involvement in this process and offer any assistance I might provide through this endeavor. I am actually a South Dakota state resident and thus not associated with the AST State Assembly here in Nebraska, but obviously as an educator, healthcare professional, and potential patient within this state, have a stake in this process.

Although I fully support any effort relative to recognition and regulation for the role of the Surgical Technologist within the state, I am concerned about the limited period proposed to "grandfather" those individuals who do not currently possess the credential but are diligently working in the role in many communities throughout Nebraska. While I do strongly believe that they should be required to complete their education where necessary and earn the appropriate credentials, I also feel that one year is not only unrealistic for these individuals, but also does a disservice to many of the smaller facilities in this region who have difficulty in recruiting and retaining qualified Surgical Technologists. By not offering a longer timeline, say 2 years at a minimum, the profession runs the risk of actually pushing licensed personnel, i.e. RNs and LPNs back into this role, something that could harm not only the workforce, but the educational programs in the long run or continue the ineffective cycle created by the usage of registry or "traveler" staff, something that is typically both a drain on resources and often detrimental to long term quality and efficiency.

Additionally, one year is not an appropriate amount of time for anyone to complete the necessary education requirements let alone educate the public sufficiently of this change, so as to provide a level playing field for individuals to make the appropriate transition. All of the programs within the State offer the training in an AAS format, thus requiring a certain amount of requisite coursework that would exceed a one year period. Furthermore, although an accelerated delivery format is acceptable, to my knowledge none of the programs in the state offer an accelerated format for their curriculum, although that is our intent here at WNCC by 2017.

Another point that needs to be made is that, at least in the panhandle region, few if any of the mid and upper level management of the healthcare facilities are even aware that this effort is taking place. Most have a certain number of individuals who are fulfilling this role that most likely will need to earn additional education etc. to meet the proposed requirement. Given the rapid expansion and growth of a number of critical access facilities in the area, the need for Surgical Technologists will obviously continue to grow. While I fully intend to meet this

demand, being a new program I realize that it will take a few graduating cohorts to meet the current and future demands for these communities.

Again, please do not misunderstand-I am in full support of any measure that bring both recognition and regulated credentialing to this role, most importantly to guarantee that surgical services and care provided to the citizens of this state are both safe and of the highest quality possible. Ultimately, legislation of this type is the only certain way in meeting those guarantees and should have the wholehearted support of all stakeholders. However, based on the timeline for compliance that is proposed I do feel that this endeavor has really only recognized the situation within the more urban eastern regions of the state and the eastern portion of the I-80 corridor, while potentially ignoring the particular needs of the more rural regions within Nebraska, thus strategically setting these facilities and their patients up to fail.

If you have any further question or concerns, please do not hesitate to contact me. I am at your service.

Respectfully,

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Rob Frey, CST/CSFA, BS, MBA WNCC Scottsbluff Campus Program Director, Surgical Technology 1601 E. 27th Street Scottsbluff, Ne. 69361 (308)630-6541 (o) (605)209-4545 (c) (308)635-6100 (f)

freyr9@wncc.edu